

DOCKETED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

FILED
IN CLERKS OFFICE

GERALD F. RICHARDS,

Plaintiff,

v.

SOUTHBRIDGE POWER & THERMAL,
LLC.

Defendant.

2004 APR 22 P 1:11
CIVIL ACTION NO. 04-40054 NMG

U.S. DISTRICT COURT
DISTRICT OF MASS.

DEFENDANT'S MOTION FOR ADMISSION OF COUNSEL

PRO HAC VICE

The Defendant, Southbridge Power & Thermal, LLC, hereby moves by undersigned counsel, Patrick J. Markey, pursuant to Local Rule 83.5.3(d) for the admission *pro hac vice* of Douglas B. Sanders, Esq. to appear and practice in this Court as co-counsel for the Defendant in this proceeding. In support of this Motion, please see the attached Affidavit of Douglas B. Sanders.

Respectfully submitted,

SOUTHBRIDGE POWER AND
THERMAL, LLC.

By:

Patrick J. Markey, Esq.

Robinson Donovan, P.C.

1500 Main Street – Suite 1600

Springfield, MA 01115

413-732-2301

BBO No.: 568124

FILED FEE PAID:

RECEIPT # 404303

AMOUNT \$ 50.00

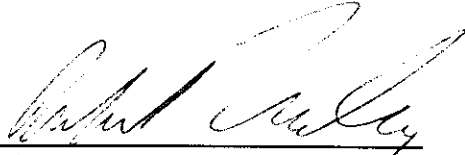
BY DPTY CLK S. Jones

DATE 4-26-04

CERTIFICATE OF SERVICE

I, Patrick J. Markey, Esq., hereby certify that on this 21st day of April, 2004, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to counsel, Charlotte E. Glinka, Keches & Mallen, P.C., 122 Dean Street, Taunton, MA 02780.

Subscribed under the penalties of perjury.



Patrick J. Markey, Esq.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GERALD F. RICHARDS,

Plaintiff,

v.

**SOUTHBRIDGE POWER &
THERMAL, LLC.**

Defendant.

CIVIL ACTION NO. 04-40054 NMG

AFFIDAVIT OF DOUGLAS B. SANDERS

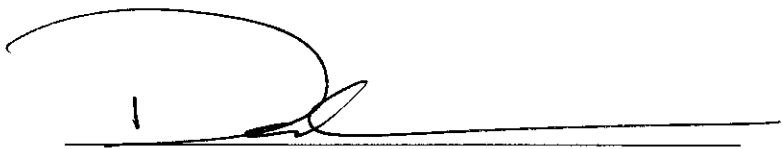
I, Douglas B. Sanders, hereby depose and say:

1. I am over the age of eighteen (18) years and understand the obligations of an oath.
2. I am a member of the law firm of Baker & McKenzie.
3. My office address is 130 E. Randolph Drive, Chicago, Illinois 60601
4. Service of all papers may be made upon Patrick Markey, Robinson Donovan Madden & Barry, Tower Square, Suite 1600, 1500 Main Street, Springfield, MA 01115, a member of the bar of this Court having an office within the District of Massachusetts.
5. I am admitted to practice before the following courts: State of Illinois (1998), Northern District of Illinois (1998) and Court of Appeals for the Seventh Circuit (2001).

6. I have never been denied admission to or disciplined by this Court or a court in any other jurisdiction.

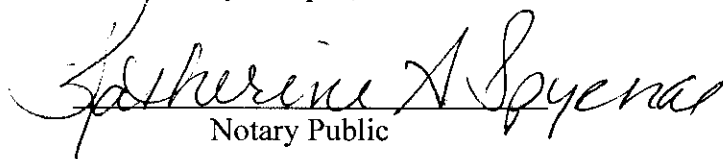
7. I am in good standing in all jurisdictions where I have been admitted to practice.

8. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.



Douglas B. Sanders

Subscribed and sworn to before me
this 19th day of April, 2004



Notary Public

My commission expires: 4/26/07

